

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ELBERTA BERNICE LIEBERMAN,)
)
Plaintiff,)
)
v.) C.A. No. 96-523-GMS
)
THE FAMILY COURT OF THE)
STATE OF DELAWARE,)
)
Defendant.)
)

DEFENDANT'S PROPOSED JURY INTERROGATORIES

Pursuant to Rule 49 of the Federal Rules of Civil Procedure, and L.R. Rule 51.I(c) defendant Family Court of the State of Delaware requests that the Court instruct the Jury to return a verdict by answering the following attached interrogatories:

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STATE OF DELAWARE,)
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Defendant.)
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JURY VERDICT SHEET

**DO YOU UNANIMOUSLY FIND FROM A PREPONDERANCE OF THE
EVIDENCE THE FOLLOWING?**

1. That plaintiff Bernice Lieberman was an "individual with a disability," as defined in these instructions?

Answer Yes or No _____

[If you answer No to this question, you need not answer any more questions. Please have the Foreperson sign the form and notify the Court Officer. If you have answered Yes, please continue to the next question]

2. That plaintiff Bernice Lieberman was an "otherwise qualified individual with a disability," as defined in these instructions?

Answer Yes or No _____

[If you answer No to this question, you need not answer any more questions. Please have the Foreperson sign the form and notify the Court Officer. If you have answered Yes, please continue to the next question]

3. That plaintiff Bernice Lieberman suffered an adverse employment decision by the Family Court?

Answer Yes or No _____

[If you answer No to this question, you need not answer any more questions. Please have the Foreperson sign the form and notify the Court Officer. If you have answered Yes, please continue to the next question]

4. That the adverse employment decision was the sole result of discrimination or a failure to reasonably accommodate for Bernice Lieberman's disability?

Answer Yes or No _____

[If you answer No to this question, you need not answer any more questions. Please have the Foreperson sign the form and notify the Court Officer. If you have answered Yes, please continue to the next question]

5. That Bernice Lieberman had requested and acted in good faith to identify reasonable accommodations?

Answer Yes or No _____

[If you answer No to this question, you need not answer any more questions. Please have the Foreperson sign the form and notify the Court Officer. If you have answered Yes, please continue to the next question]

6. That the Family Court had acted in good faith in attempting to find reasonable accommodations for Bernice Lieberman?

Answer Yes or No _____

7. That Bernice Lieberman could have been reasonably accommodated by the Family Court.

Answer Yes or No _____

[If you answer No to this question, you need not answer any more questions. Please have the Foreperson sign the form and notify the Court Officer. If you have answered Yes, please continue to the next question]

8. Did the Family Court prove that the accommodations requested by the plaintiff are unreasonable, or would cause an undue hardship on the employer?

Answer Yes or No _____

[If you answer Yes to this question, you need not answer any more questions. Please have the Foreperson sign the form and notify the Court Officer. If you have answered No, please continue to the next question]

9. That plaintiff Bernice Lieberman should be awarded compensatory damages?

Answer Yes or No _____

If your answer is "Yes," in what amount? \$ _____

Foreperson